

Exhibit 32

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

ORACLE AMERICA, INC.,

Plaintiff,

vs.

GOOGLE INC.,

Defendant.

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)Case No.:

)CV 10-03561 WHA

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HIGHLY CONFIDENTIAL - OUTSIDE ATTORNEYS' EYES ONLY

VIDEOTAPED DEPOSITION OF GEORGES SAAB

Palo Alto, California

Wednesday, December 16, 2015

Volume 1

Reported by:

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1 the future.

2 BY MR. RAGLAND:

3 Q If someone were to come to you and say, "Hey,
4 Mr. Saab" -- or, "Hey, Georges, tell me what you think.
5 What's the one area that we should be focusing on with
6 regards to expansion of Java?" what would you tell that
7 person?

8 MR. RAMSEY: Objection; form.

9 THE WITNESS: I think, right now, continuing
10 Java's excellent track record of making a consistent and
11 compatible version across all of the areas where --
12 where people would like to deploy Java applications.

13 BY MR. RAGLAND:

14 Q What do you think are the biggest challenges
15 Oracle faces for expansion of its Java business?

16 MR. RAMSEY: Objection; form.

17 THE WITNESS: I think there are a number. I
18 think that there is competition from -- from other
19 languages and platforms that people can choose, and I
20 think it's a big challenge that there's a large segment
21 of the market that is essentially closed to us.

22 BY MR. RAGLAND:

23 Q And you believe that that segment of the market
24 that's closed to you is due to actions by third parties
25 and not anything that Oracle has or has not done; right?

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1 of -- in your words, I believe you said stolen
2 technology and that you believe it's key to the success
3 of Android.

4 And I'm just trying to understand whether or not
5 you believe that Google's use of the 37 APIs at
6 issue -- strike that.

7 In using the -- strike that. We will come back.

8 Do you think that anything other than the
9 sequence, structure, and organization of 37 Java API
10 packets contributed to Google's success in Android?

11 MR. RAMSEY: Objection; form.

12 THE WITNESS: I don't think you can ignore the
13 contribution that was made from those APIs' existence as
14 a part of Android.

15 BY MR. RAGLAND:

16 Q Why?

17 A Because I believe that those were fundamental
18 contributors to it being possible for the platform to be
19 adopted so quickly.

20 Q Why do you believe they were fundamental
21 contributors to being possible for the platform to be
22 adopted so quickly?

23 A Because it meant that people who were out there
24 and familiar with those APIs were able to -- to take
25 this platform and start using it more quickly.

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1 A I believe that -- that, very specifically, it is
2 hard for us to compete in the areas where Android is
3 going after, from a business perspective, because our
4 technology has been taken and given away for free.

5 Q You say "our technology has been taken and given
6 away for free."

7 What do you mean by that? What technology?

8 A I mean that the APIs for Java have been stolen
9 and given away for free.

10 Q So do you believe that it's the sequence,
11 structure, and organization of 37 Java APIs that are the
12 key to Android's success?

13 A I believe that it is -- that it is an incredible
14 contribution to Android's success that the APIs and the
15 work and creativity that Sun put in in order to make
16 something that was easy and approachable and
17 understandable to Java developers could be co-opted in
18 order to more quickly build up a critical mass.

19 Q Do you believe that Google has transformed those
20 APIs in producing Android?

21 MR. RAMSEY: Objection; form.

22 THE WITNESS: I don't understand the question.

23 MR. RAGLAND: Sure.

24 Q Well, I'm just trying to understand whether or
25 not you believe that -- so you talked about Google's use

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1 Q Are you generally familiar with Apple's operating
2 system for mobile devices?

3 A I'm familiar with it as a user.

4 Q How about as a -- you have done programming in
5 your career; right?

6 A Yes.

7 Q Okay. How about as a programmer; do you
8 understand what language iOS is in?

9 A I understand what language is provided for people
10 writing applications for iOS.

11 Q And what is that?

12 A Originally, it was Objective-C, and, more
13 recently, they have written their own language with
14 their own set of APIs called Swift.

15 Q And folks developing programs for Apple devices
16 need to learn Apple's language in order to do that;
17 right?

18 A I don't -- I don't think you can call it Apple's
19 language. If you mean they needed to learn Objective-C
20 and now -- and/or Swift in order to write applications
21 for iOS, then, yes.

22 Q iOS does not include any of the 37 API packets at
23 issue in this case; right?

24 A Not to my knowledge.

25 Q Yet iOS took off pretty rapidly; right?

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